

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL MEYER, an individual,)
CHRISTOPHER MEYER, an individual,)
AND MEYER CAPITAL GROUP, LLC, a)
Missouri limited liability company,)

Plaintiffs,)

vs.)

Case No. 17-CV-00289

EVERETT GRADY, an individual,)
KATHRYN GRADY, an individual, and)
KAEGEM, CORP., an Illinois corporation,)

Defendants.)

MOTION FOR ENTRY OF STIPULATED JUDGMENT

Plaintiffs Michael Meyer, Christopher Meyer and Meyer Capital Group, LLC (collectively, the “Plaintiffs”), by and through their attorneys, respectfully move this Court for entry of the Stipulated Judgment set forth in Exhibit A to this Motion. In support of this motion, the Plaintiffs state as follows:

1. As indicated in the Stipulated Judgment, a judgment denying the discharge of the debtors there (the two individual defendants in this case) – Everett Grady and Kathryn Grady – was entered on September 10, 2019 in Adversary Case No. 17-07043 within the Chapter 7 Bankruptcy case pending in the Central District of Illinois Bankruptcy Court, Case No. 17-70853.

2. In light of the judgment in the adversary proceeding denying Mr. and Mrs. Grady a discharge in bankruptcy, on September 25, 2019, the bankruptcy court closed the bankruptcy case.

3. As a result, the bankruptcy case has concluded and there no longer exists an automatic stay with respect to this matter.

4. The parties have resolved their claims with respect to this case, which resolution requires the entry of the Stipulated Judgment attached as Exhibit A.

5. As evidenced by their signatures on the Stipulated Judgment, the Plaintiffs and the Defendants, Everett Grady, Kathryn Grady, and Kaegem, Corp. have agreed and stipulated to the entry of the Stipulated Judgment.

WHEREFORE, the Plaintiffs respectfully requests that this Court: (i) grant this Motion, (ii) enter the Stipulated Judgment attached as Exhibit A to this Motion, and (iii) grant such other and further relief as this Court deems just and proper.

Date: October 2, 2019

Respectfully submitted,

By: /s/ Michael P. Tomlinson

Michael P. Tomlinson (IL Bar No. 6279930)
Tomlinson & Shapiro, P.C.
8501 W. Higgins Road, Ste. 420
Chicago, IL 60631
Phone: (312) 715-8770
Email: mpt@tomlinsonshapiro.com

CERTIFICATE OF SERVICE

I, Michael P. Tomlinson, an attorney, hereby certify that on October 2, 2019, I caused the foregoing Motion for Entry of Stipulated Judgment to be served upon all persons and entities authorized and registered to receive such service through the Court's Case Management/Electronic Case Files (CM/ECF) system. I further caused the foregoing Motion for Entry of Stipulated Judgment to be served on the Defendants *via* electronic mail at the email addresses set forth below:

Everett Grady
528 Rosedale Blvd.
Jacksonville, IL 62650
egrady777@gmail.com

Kathryn Grady
528 Rosedale Blvd.
Jacksonville, IL 62650
kaedry@yahoo.com

/s/ Michael P. Tomlinson
Michael P. Tomlinson